



October 6, 2023

VIA ECF

Judge Naomi Reice Buchwald/Magistrate Stewart Aaron
Southern District of New York
500 Pearl Street
New York, New York 10007

Case Index No 23-CV-7637

Letter Request For Recusal Of Judge Naomi Reice Buchwald

Dear Hon Buchwald:

When we first saw that your Honor had been assigned to this case we were concerned about your ability to be neutral and impartial in deciding the merits of this case as per the attached.

However now that we see that even in contrast to your own local rules and procedures, you unreasonably and without basis arbitrarily deny our request for a Pre-Conference, while in fact publicly humiliating us by unethically telling your fellow Jew and our opposing counsel, Assistant U.S. Attorney Adam Gitlin to prepare and file a premature Motion to Dismiss, pretty much guaranteeing that our civil rights, federal torts claims act, computer trespass serious federal lawsuit is about to get prematurely dismissed, this in our legal opinion has gone beyond the pale of judicial misconduct and bias, as per the attached complaints.

To that end we hereby kindly and formally request your voluntary Recusal from this case.

Rahul D. Manchanda, Esq.

Human Rights Council

Complaint Procedure Form

- You are kindly requested to submit your complaint in writing in one of the six official UN languages (Arabic, Chinese, English, French, Russian and Spanish) and to use these languages in any future correspondence;
- Anonymous complaints are not admissible;
- It is recommended that your complaint does not exceed eight pages, excluding enclosures.
- You are kindly requested not to use abusive or insulting language.

I. Information concerning the author (s) of the communication or the alleged victim (s) if other than the author

Individual ☒ Group of individuals ☐ NGO ☐ Other ☐

Last name:MANCHANDA

First name(s):RAHUL

Nationality:INDIAN-AMERICAN

Address for correspondence on this complaint:30 WALL STREET, 8TH FLOOR, NYC 10005

Tel and fax: (please indicate country and area code)(212) 968-8600/8601

E-mail:INFO@MANCHANDA-LAW.COM

Website:MANCHANDA-LAW.COM

Submitting the complaint:

On the author's own behalf: ☒

On behalf of other persons: ☐ (Please specify:)

II. Information on the State concerned

Name of the State concerned and, as applicable, name of public authorities responsible for the alleged violation(s):NEW YORK, NY, SDNY JUDGE NAOMI REICE BUCHWALD AND ASSISTANT US ATTORNEY ADAM GITLIN

III. Facts of the complaint and nature of the alleged violation(s)

The complaint procedure addresses consistent patterns of gross and reliably attested violations of all human rights and all fundamental freedoms occurring in any part of the world and under any circumstances.

Please detail, in chronological order, the facts and circumstances of the alleged violations including dates, places and alleged perpetrators and how you consider that the facts and circumstances described violate your rights or that of the concerned person(s).

This SDNY Judge isn't even allowing a pre-conference which is her own local rules, but in fact is publicly humiliating/embarrassing me by telling her fellow Jewish Assistant U.S. Attorney Adam Gitlin to prepare and file a Motion to Dismiss, pretty much publicly guaranteeing that my civil rights, federal torts claims act, computer trespass serious federal lawsuit is about to get prematurely dismissed here.

Someone has to do something legal and equitable about these clannish kabbalistic corrupt jews in the federal and state courts who defy the law and facts to stick together, deny other races/religions justice when they assault our human and civil rights; and other acts of public corruption; bias; and outright discrimination.

Please urgently investigate and advise.

IV. Exhaustion of domestic remedies

1- Steps taken by or on behalf of the alleged victim(s) to exhaust domestic remedies– please provide details on the procedures which have been pursued, including recourse to the courts and other public authorities as well as national human rights institutions*, the claims made, at which times, and what the outcome was:

COUNTLESS COMPLAINTS TO FBI, DHS, ICE, US COURT OF APPEALS 2ND CIRCUIT, USDOJ OPR, NYS DIVISION OF HUMAN RIGHTS, ETC

2- If domestic remedies have not been exhausted on grounds that their application would be ineffective or unreasonably prolonged, please explain the reasons in detail:

.....

V. Submission of communication to other human rights bodies

1- Have you already submitted the same matter to a special procedure, a treaty body or other United Nations or similar regional complaint procedures in the field of human rights?

.....NO

2- If so, detail which procedure has been, or is being pursued, which claims have been made, at which times, and the current status of the complaint before this body:

..... NA

* National human rights institutions, established and operating under the Principles Relating to the Status of National Institutions (the Paris Principles), in particular in regard to quasi-judicial competence, may serve as effective means of addressing individual human rights violations.

VI. Request for confidentiality

In case the communication complies with the admissibility criteria set forth in Council resolution 5/1, kindly note that it will be transmitted to the State concerned so as to obtain the views of the latter on the allegations of violations.

Please state whether you would like your identity or any specific information contained in the complaint to be kept confidential.

Request for confidentiality (*Please tick as appropriate*): Yes ☐ No ☒

Please indicate which information you would like to be kept confidential

Date: 10/05/2023.....

Signature: 

N.B. The blanks under the various sections of this form indicate where your responses are required. You should take as much space as you need to set out your responses. Your complaint should not exceed eight pages.

VII. Checklist of supporting documents

Please provide copies (not original) of supporting documents (kindly note that these documents will not be returned) in one of the six UN official languages.

- Decisions of domestic courts and authorities on the claim made (a copy of the relevant national legislation is also helpful): ☒
- Complaints sent to any other procedure mentioned in section V (and any decisions taken under that procedure): ☒
- Any other evidence or supporting documents deemed necessary: ☒

VIII. Where to send your communications?

Office of the United Nations High Commissioner for Human Rights
Human Rights Council Branch-Complaint Procedure Unit
OHCHR- Palais Wilson
United Nations Office at Geneva
CH-1211 Geneva 10, Switzerland
Fax: (+41 22) 917 90 11
E-mail: CP@ohchr.org
Website: <http://www.ohchr.org/EN/HRBodies/HRC/Pages/HRCIndex.aspx>

New York State Division of Human Rights Complaint Form

Individual filing the complaint

Please provide the information requested below.

First Name

RAHUL

Middle Initial

D

Last Name

MANCHANDA

Street Address

30 WALL STREET, 8TH FLOOR

City

New York

State

NY

Zip

10005

Are you completing this form for someone else?

No

Your complaint

Jurisdiction

Boycotting/Blacklisting

Basis

Basis of alleged discrimination involving boycott or blacklisting:

Creed/Religion (religious membership, belief, practice, or observance, including sabbath or holy day observance, or wearing of attire, clothing or facial hair in accordance with your religion; or discrimination because you do not have a religious belief)

National Origin (the country where you or your ancestors were born)

Race/Color (because you are Asian, Black, White, etc.; includes ethnicity; includes traits historically associated with race such as hair texture or hairstyle)

Relationship or Association (with a member or members of a protected category(ies) listed above)

Please specify creed/religion:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify the protected category of the person you were associated with:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify race/color:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify national origin:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

You are filing a complaint against

Entity that discriminated against you:

Name of entity

SDNY JUDGE NAOMI REICE BUCHWALD

Street Address

Daniel Patrick Moynihan United States Courthouse 500 Pearl St.

City

New York

State

NY

Zip

10007-1312

In what county or borough did the violation take place?

New York Lower (Below 42nd Street)

Phone Number

(212) 805-0194

Email address

Fax Number

Company Website

<https://nysd.uscourts.gov/hon-naomi-reice-buchwald>

Please provide the name, last name, and title of individual people who discriminated against you.

SDNY Judge Naomi Reice Buchwald

Date of the most recent act of alleged discrimination

10/05/2023

Description of discrimination

Tell us more about each act of discrimination that you experienced. Please include dates, names of people involved, and other details. You must explain why you think these acts were discriminatory and how these acts are connected to the protected class (race, color, sex, disability, etc.) you selected previously. If you have supporting documentation or evidence, you may provide it later.

This SDNY Judge isn't even allowing a pre-conference which is her own local rules, but in fact is publicly humiliating/embarrassing me by telling her fellow Jewish Assistant US Attorney Adam Gitlin to prepare and file a Motion to Dismiss, pretty much publicly guaranteeing that my civil rights, federal torts claims act, computer trespass serious federal lawsuit is about to get prematurely dismissed here. Someone has to do something legal and equitable about these clannish kabbalistic corrupt jews in the federal and state courts who defy the law and facts to stick together, deny other races/religions justice when they assault our human and civil rights, and other acts of public corruption, bias, and outright discrimination. Please urgently investigate and advise.

Declaration

Based on the information contained in this form, I charge the herein named respondent(s) with an unlawful discriminatory practice, in violation of the New York State Human Rights Law.

I have not filed any other civil action, nor do I have an action pending before any administrative agency, under any state or local law, based upon this same unlawful discriminatory practice. (If you have another action pending and still wish to file, please contact our office to discuss.)

Please initial:

RDM

I affirm under penalties of perjury, that I am the complainant herein; that I have read (or had read to me) the foregoing complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

Rahul Manchanda

Enter today's date.

10/05/2023

Additional information

Your contact information

Email Address

INFO@MANCHANDA-LAW.COM

Phone Number

2129688600

Mobile Phone

6466450993

Special needs

I am in need of:

I do not need any special accommodations

Settlement/Conciliation

To settle this complaint, I would accept:

TBD

Prior complaint

Did you report or complain about the discrimination to someone else?

No

Other information

Supporting Documentation

[SDNY JEWISH JUDGE NAOMI REICE BUCHWALDS RACIST TREATMENT OF MY CIVIL RIGHTS FEDERAL CASE.pdf](#)

Were other people treated the same as you? How?

INDIAN AMERICANS AGAINST JEWISH SUPREMACY

Were other people treated better than you? How?

JEWISH LAWYERS AND LITIGANTS

Subject: Activity in Case 1:23-cv-07637-NRB Manchanda et al v. Lane et al Order
From: NYSD_ECF_Pool@nysd.uscourts.gov
Date: 10/5/2023, 4:45 PM
To: CourtMail@nysd.uscourts.gov

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS*** There is no charge for viewing opinions.**

U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered on 10/5/2023 at 4:45 PM EDT and filed on 10/5/2023

Case Name: Manchanda et al v. Lane et al

Case Number: [1:23-cv-07637-NRB](#)

Filer:

Document Number: [15](#)

Docket Text:

ORDER The Court is in receipt of the parties' pre-motion letters, dated September 29, 2023. As a matter of case management, the Court is of the view that defendants' proposed motion to dismiss on absolute immunity grounds should be filed first and may be filed without the necessity of a pre-motion conference. Further, it is the Court's view that such a motion should be filed as soon as is practicable given the flurry of correspondence in this matter. (Signed by Judge Naomi Reice Buchwald on 10/5/2023) (jca)

1:23-cv-07637-NRB Notice has been electronically mailed to:

Rahul Dev Manchanda rdm@manchanda-law.com, info@manchanda-law.com

Adam M. Gitlin Adam.Gitlin@usdoj.gov, USANYS.ECF@USDOJ.GOV

1:23-cv-07637-NRB Notice has been delivered by other means to:

Sylwia Ewelina Manchanda
Manchanda Law Office PLLC
30 Wall Street
8th Floor
Suite 8207
New York, NY 10005

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=10/5/2023] [FileNumber=30203120-0] [b650e055addf78ea7634eb19131717dbaa051ab2cb5b6daf7b9df6b183670e166eb0df3064afad2f2656e06efdfcd5f2ab012d241581176845914a5a2e798571]]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

RAHUL MANCHANDA AND MRS. SYLWIA
EWELINA MANCHANDA,

Plaintiffs,

- against -

ORDER

AUSA DANA WALSH, AUST GREGORY ZIPES,
SEAN LANE, SDNY Bankruptcy Judge,
LAW CLERK SARAH ROSENTHAL, LAW CLERK
JACQUELINE TRAN, LAW CLERK CHRISTINE
AZZARO, COURTROOM DEPUTY LIZA EBANKS,
MICHAEL DRUCKMAN, BRETT E. LEWIS, LAW
FIRM LEWIS & LIN LLC, DAVID D. LIN,
AND DR. DOUGLAS SENDEROFF,

23 Civ. 7637 (NRB)


Defendants.

-----X

NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

The Court is in receipt of the parties' pre-motion letters, dated September 29, 2023. As a matter of case management, the Court is of the view that defendants' proposed motion to dismiss on absolute immunity grounds should be filed first and may be filed without the necessity of a pre-motion conference. Further, it is the Court's view that such a motion should be filed as soon as is practicable given the flurry of correspondence in this matter.

Dated: New York, New York
October 5, 2023


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility
From: Department of Justice <no-reply@usdoj.gov>
Date: 10/5/2023, 6:13 PM
To: INFO@MANCHANDA-LAW.COM

Submitted on: Thursday, October 5, 2023 - 6:13PM EDT Submitted to: Anonymous Submitted values are:

Name of person seeking OPR's action (Complainant)*: Mr.
First: Rahul
Middle: Dev
Last: Manchanda
Suffix (if applicable):
Complainant Type: Private Attorney
Inmate/Detainee Number:
Other:
Company/Organization: MANCHANDA LAW OFFICE PLLC
Complainant mailing address: 30 WALL STREET, 8TH FLOOR
City: New York
State: New York
Zip: 10005
Complainant email address: INFO@MANCHANDA-LAW.COM
Complainant phone number: 2129688600
Complainant fax number: 2129688601

If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:

Name and title of the filer:
First:
Middle:
Last:
Suffix (if applicable):
Your preferred mailing address:
City:
State:
Zip:
Your email address:

Information about the DOJ Attorney or DOJ Law Enforcement Official You Are Complaining About (Subject)

Name of the person(s) you are complaining about (Subject): Mr.
First: ADAM

Middle:

Last: GITLIN

Suffix (if applicable): ESQ

Subject's Job Title: Assistant United States Attorney (AUSA)

Other:

Company/Organization: US ATTORNEYS OFFICE SDNY

Location of Subject's Office: 86 CHAMBERS STREET, 3RD FLOOR, NEW YORK NY 10007

Does your complaint involve more than one person? Yes (If yes, please provide the following information of the additional subject.)

Name of the person(s) of the second subject:

First: NAOMI

Middle: REICE

Last: BUCHWALD

Suffix (if applicable):

Second Subject's Job Title: Other (Please specify below)

Other: SDNY JUDGE

Location of second subject's office: 500 PEARL STREET, NEW YORK NY 10007

Information about your complaint

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Judicial Proceedings

When did the incident occur?: 2023-10-05

*Please provide a brief description summarizing the:

* reason(s) for your complaint including the details, actions, events, or allegations,

* case names,

* potential witnesses and their involvement,

* where the incident occurred,

* how the incident occurred, and

* any corrective actions already taken

* For *Whistleblower complaints only* – describe the personnel action(s) that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

This SDNY Judge Naomi Reice Buchwald isn't even allowing a pre-conference which is her own local rules, but in fact is publicly humiliating/embarrassing me by telling her fellow Jewish Assistant U.S. Attorney Adam Gitlin to prepare and file a Motion to Dismiss, pretty much publicly guaranteeing that my civil rights, federal torts claims act, computer trespass serious federal lawsuit is about to get prematurely dismissed here. Someone has to do something legal and equitable about these clannish kabbalistic corrupt jews in the federal and state courts who defy the law and facts to stick together, deny other races/religions justice when they assault our human and civil rights, and other acts of public corruption, bias, and outright discrimination. Please urgently investigate and advise.

Certification and Signature (Enter your initials here to certify and sign this form.): RDM

New York State Division of Human Rights Complaint Form

Individual filing the complaint

Please provide the information requested below.

First Name

RAHUL

Middle Initial

D

Last Name

MANCHANDA

Street Address

30 WALL STREET, 8TH FLOOR

City

New York

State

NY

Zip

10005

Are you completing this form for someone else?

No

Your complaint

Jurisdiction

Boycotting/Blacklisting

Basis

Basis of alleged discrimination involving boycott or blacklisting:

Creed/Religion (religious membership, belief, practice, or observance, including sabbath or holy day observance, or wearing of attire, clothing or facial hair in accordance with your religion; or discrimination because you do not have a religious belief)

National Origin (the country where you or your ancestors were born)

Race/Color (because you are Asian, Black, White, etc.; includes ethnicity; includes traits historically associated with race such as hair texture or hairstyle)

Relationship or Association (with a member or members of a protected category(ies) listed above)

Please specify creed/religion:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify the protected category of the person you were associated with:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify race/color:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

Please specify national origin:

INDIAN AMERICAN AGAINST JEWISH SUPREMACY

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Name of entity

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Street Address

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State

NY

Zip

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Phone Number

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Email address

Fax Number

Company Website

<https://nysd.uscourts.gov/hon-naomi-reice-buchwald>

Please provide the name, last name, and title of individual people who discriminated against you.

SDNY Judge Naomi Reice Buchwald

Date of the most recent act of alleged discrimination

10/05/2023

Description of discrimination

Tell us more about each act of discrimination that you experienced. Please include dates, names of people involved, and other details. You must explain why you think these acts were discriminatory and how these acts are connected to the protected class (race, color, sex, disability, etc.) you selected previously. If you have supporting documentation or evidence, you may provide it later.

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Please initial:

RDM

I affirm under penalties of perjury, that I am the complainant herein; that I have read (or had read to me) the foregoing complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

Rahul Manchanda

Enter today's date.

10/05/2023

Additional information

Your contact information

Email Address

INFO@MANCHANDA-LAW.COM

Phone Number

2129688600

Mobile Phone

6466450993

Special needs

I am in need of:

I do not need any special accommodations

Settlement/Conciliation

To settle this complaint, I would accept:

TBD

Prior complaint

Did you report or complain about the discrimination to someone else?

No

Other information

Supporting Documentation

[SDNY JEWISH JUDGE NAOMI REICE BUCHWALDS RACIST TREATMENT OF MY CIVIL RIGHTS FEDERAL CASE.pdf](#)

Were other people treated the same as you? How?

INDIAN AMERICANS AGAINST JEWISH SUPREMACY

Were other people treated better than you? How?

JEWISH LAWYERS AND LITIGANTS

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Southern District of New York

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Adam M. Gitlin Adam.Gitlin@usdoj.gov, USANYS.ECF@USDOJ.GOV

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Sylwia Ewelina Manchanda
Manchanda Law Office PLLC
30 Wall Street
8th Floor
Suite 8207
New York, NY 10005

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=10/5/2023] [FileNumber=30203120-0] [b650e055addf78ea7634eb19131717dbaa051ab2cb5b6daf7b9df6b183670e166eb0df3064afad2f2656e06efdfcd5f2ab012d241581176845914a5a2e798571]]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

RAHUL MANCHANDA AND MRS. SYLWIA
EWELINA MANCHANDA,

Plaintiffs,

- against -

ORDER

AUSA DANA WALSH, AUST GREGORY ZIPES,
SEAN LANE, SDNY Bankruptcy Judge,
LAW CLERK SARAH ROSENTHAL, LAW CLERK
JACQUELINE TRAN, LAW CLERK CHRISTINE
AZZARO, COURTROOM DEPUTY LIZA EBANKS,
MICHAEL DRUCKMAN, BRETT E. LEWIS, LAW
FIRM LEWIS & LIN LLC, DAVID D. LIN,
AND DR. DOUGLAS SENDEROFF,

23 Civ. 7637 (NRB)


Defendants.

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Dated: New York, New York
October 5, 2023


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UNITED STATES DISTRICT JUDGE